

O'TOOLE SCRIVO
A LIMITED LIABILITY COMPANY

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Via CM/ECF

Hon. Andre M. Espinosa, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Courtroom MLK 2D
Newark, New Jersey 07101

Re: *New Wallington Home, LLC, et al. v. Borough of Wallington, et al.*
Civil Case No.: 20-08178 (EP) (AME)

Dear Judge Espinosa:

This firm represents Plaintiffs in this matter. We write to provide a joint status update in advance of the telephonic status conference scheduled for July 21, 2025 at 11 a.m. before Your Honor.

In accordance with the May 2, 2025, Case Management Order, on June 30, 2025, Plaintiff's served three affirmative expert reports on Defendants: (1) June 25, 2025, Expert Report of Arthur Linfante of Integra Realty Resources as of March 1, 2025; (2) June 30, 2025, Expert Report of Dr. Justin Steil of MIT; and (3) June 24, 2025, Expert Report of Matthew Seckler of Stonefield.

Pursuant to the Court's Order, Defendants' expert report(s) are to be served by August 29, 2025; and all expert depositions are to be completed by October 13, 2025. To date, Plaintiffs have not received any expert disclosures from Defendants.

If Defendants intend to serve expert reports, Plaintiffs would request that Defendants disclose these experts as soon as possible. If Defendants do not intend to serve expert reports, Plaintiffs are prepared to move forward with dispositive motions at the conclusion of discovery in accordance with the Federal Rules of Civil Procedure, the Local Civil Rules and Judge Padin's Pretrial Procedures.

Respectfully submitted,

/s/ James DiGiulio
James DiGiulio

cc: All Counsel of Record (via ECF)